REMARKS/ARGUMENTS

The Examiner rejected claims 1-20 as anticipated (35 U.S.C. §102(b)) by Linde (U.S. Patent No. 6,660,665). Applicants traverse.

Amended claim 1 recites a storage area network (SAN) including a first and second digital data processors executing a first and second operating systems, respectively, in communication with one or more storage devices, comprising: a first platform-specific process executing on the first digital data processor; a second platform-specific process executing on the second digital data processor, wherein the second operating system is different from the first operating system; common platform-independent processes executing on the first and the second digital data processors; and the platform-independent processes effecting execution of the first and second platform-specific processes via command line parameters.

Applicants amended claim 1 to change the format of certain limitations and recite that multiple platform-independent processes execute on the first and second digital data processors. FIG. 43 and the specification disclose common code, also referred to as the framework on different hosts. (Pg. 191, lines 11-22.

The Examiner cited col. 4, lines 35-44 of Linde as teaching the claim requirements. (Office Action, pgs. 2-3) The cited col. 4 mentions a SAN having clients connected to server storage devices via a server. The server uses a front end driver to present disk images to the client system. A request for data will be translated by the server to the correct command sequence for a native device driver, which communicates with a storage device. Nowhere does the cited col. 4 disclose common platform independent processes executing on first and second digital data processors effecting execution of first and second platform specific processes via command line parameters. Instead, the cited col. 4 discusses how a server translates a request for data to a command sequence for a native NT device driver. There is no disclosure in this cited col. 4 of effecting execution of first and second platform-specific processes executing on processors executing different operating systems. Instead, the cited col. 4 concerns a server controlling a single device driver to request data.

The Examiner cited col. 4, lines 45-50 as disclosing the use of different operating systems. (Office Action, pg. 3) The cited col. 4 mentions that the server can communicate with device drivers for operating systems other than NT. However, nowhere does the cited col. 4 anywhere disclose common platform independent processes executing on different processors

effecting execution of platform specific processes executing on different operating system. The cited col. 3 only mentions the server may communicate with device drivers for operating systems other than NT. Nowhere is there disclosure in the cited col. 4 of common platform independent processes executing on different processors effecting execution as claimed.

The Examiner further mentioned that Linde shows a client request sent to a storage server that "effect executions on the client machines as claimed". (Office Action, pg. 3) Applicants traverse. Linde discusses how a volume insight architecture uses a volume insight driver to control server access of the client on the server disk Linde mentions the volume insight driver presents a standard disk driver interface to the server to provide read/write commands to control the I/O device. (col. 3, line 43 to col. 4, line 16) In the cited Linde there is discussion of a single server receiving requests from clients and translating them into commands for the underlying driver. The overhead of the translation on the server has no. effect on the clients. (col. 4, lines 8-17). Nowhere does this cited Linde disclose common platform independent processes on first and second processors effecting execution of first and second platform specific processes on different processors via command line parameters. There is no disclosure in the cited Linde of the common platform independent processes effecting execution via command line parameters.

Accordingly, claim 1 is patentable over the cited Linde because the cited Linde does not disclose all the claim requirements.

Claims 2-14 are patentable over the cited art because they depend from claim 1, which is patentable over the cited art for the reasons discussed above. Applicants amended these claims to change the format of the claim requirements. Moreover, the following dependent claims provide further grounds of distinction over the cited art.

Amended claim 2 depends from claim 1 and requires that each of the platform-specific processes communicate with the platform-independent process via a command line interface of its respective digital data processor operating system.

The Examiner found that in FIG. 1 of Linde, when a file request is made through a network, the comment is sent out by a process from each of the clients that is platform independent. Although in Linde the clients may submit requests from a platform independent process, claim 2 requires that platform specific processes executed by different processes communicates with a platform dependent process in the same machine via a command line interface of the operating system on the processor. The cited Linde concerns how clients

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transmit data request over a network to a server. Nowhere does this cited Linde disclose or mention that platform specific processes on the first and second processors each communicate with the common platform independent process on the same machine via a command line interface. Further, nowhere does the cited Linde disclose or show that the clients communicate with the server via command line interfaces of the processors' operating system as claimed.

Accordingly, claim 2 provides additional grounds of patentability over the cited art because the additional requirements of these claims are not disclosed in the cited art.

Amended claim 4 depends from claim 1 and further requires a manager in communication with the common platform-independent process to transmit a request thereto for information regarding one or more components of the SAN.

The Examiner cited the server of Linde as equivalent to the claimed manager. (Office Action, pgs. 4-5) Applicants traverse.

The cited server of Linde communicates with a native device driver to access a storage device. (col. 4, lines 35-45) Nowhere does the cited Linde disclose that the server communicates with common platform independent processes to transmit a request to these processes for information regarding components of the SAN. Instead, the cited server of Linde may receive data requests from the client, but Linde does not disclose the server transmitting requests to common platform independent processes on different processors for information on the SAN as claimed.

Accordingly, claim 4 provides additional grounds of patentability over the cited art because the additional requirements of these claims are not disclosed in the cited art.

Amended claim 6 depends from claim 5 and further require that the invoked platform specific processes gather information regarding one or more SAN components and transmit the information to the Standard Output/Error of its respective digital data processor.

The Examiner found that anytime data is viewed, such as retrieved through a SAN, it must be transferred through standard output/error and that Linde discusses different I/O device types. (Office Action, pg. 5) Nowhere does the cited Linde anywhere disclose separate platform specific processes executing on different processors having different operating systems gathering information on SAN components and transmit to the standard output/error. Instead, the cited Linde discusses how a server accesses storage devices.

Accordingly, claim 6 provides additional grounds of patentability over the cited art because the additional requirements of these claims are not disclosed in the cited art.

Amended claim 9 recites that the manager comprises a query engine for transmitting the request to the common platform independent processes.

The Examiner cited the server of Linde as disclosing the claimed manager comprising a query engine. (Office Action, pg. 6) Applicants traverse.

The cited Linde discusses how a server communicates with a device driver to access a device. Nowhere does the cited Linde disclose that the server has a query engine for transmitting a request to common platform independent processes on different processors having different operating systems as claimed.

Accordingly, claim 9 provides additional grounds of patentability over the cited art because the additional requirements of these claims are not disclosed in the cited art.

Claims 10-14 provide additional grounds of patentability over the cited art because they provide further details on the manager query engine.

Claim 15 substantially includes the requirements of claims 1 and 4 and, thus, is patentable over the cited Linde for the reasons discussed with respect to claim 1.

Claims 16-20 are patentable over the cited art because they depend from claim 15, which is patentable over the cited art for the reasons discussed above. Further, claims 16-19 include similar limitations to claims 6, 7, 9, and 10, and thus provide additional grounds of patentability over the cited art for the reasons discussed with respect to claims 6, 7, 9, and 10.

Added claims 21-26 substantially include the requirements of claims 2, 4, 5, 6, and 9 in computer readable media form and thus are patentable over the cited art for the reasons discussed above with respect to claims 2, 4, 5, 6, and 9.

Conclusion

For all the above reasons, Applicant submits that the pending claims 1-26 are patentable over the art of record. Applicants submit herewith the fee for the added claims. Nonetheless, should any additional fees be required, please charge Deposit Account No. 09-0466.
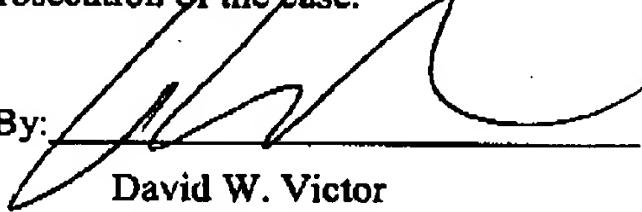
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The attorney of record invites the Examiner to contact him at (310) 553-7977 if the

Examiner believes such contact would advance the prosecution of the case.

Dated: March 21, 2005

By: _____

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